

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD—
LOS ANGELES REGION**

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June 17, 1987

Mr. Eugene Palic
Ocean Technology, Inc (OTI)
2835 N. Naomi Street
Burbank, CA 91504

WORK PLAN REVIEW (FILE NO. 104.0793)

As discussed in our meeting of May 15, 1987, the California Regional Water Quality Control Board (RWQCB), Los Angeles Region, has reviewed the data supplied by Ocean Technology, Inc (OTI) regarding the site assessment work plan previously submitted to the L.A. County Department of Public Works, Waste Management Department (LACDPW). In April, 1987 the LACDPW transferred responsibility for this case to the RWQCB. The Board staff will therefore approve investigative and remedial work plans for soil and potential ground water contamination found at the underground tank site on the OTI facility.

Board staff requests a revised work plan which will offer conclusive evidence regarding the nature of any soil contamination which exists at the tank site. Reference is made to your current work plan submitted to the LACDPW on March 16, 1987, wherever applicable. The potential for impact to the ground water will be decided in due course. An attachment to this letter reviews the past events as seen by Board staff, and supports the decision to request revision of the current work plan.

OTI should submit a revised work plan which reflects the enclosed "Work Plan Requirements". This guideline addresses specific sampling and laboratory procedures required by Board staff. It is expected that OTI, their consultant and laboratory acknowledge and fully understand Board requirements prior to incurring further time and expense.

The revised work plan must also include the following:

1. A facility map. In addition to the vicinity map and site plan, a scaled map of the entire facility is needed, depicting all boundaries, buildings, etc.

2. Description of proposed soil borings, including the following:
 - a) Locations of all proposed borings. The Board recommends six borings be taken in the vicinity of the tank excavation and stepping out from the boring northeast of the excavation. Borings may be illustrated on the same site plan found in your current proposed work plan.
 - b) Rationale for the locations of all proposed borings.
 - c) Depth of each proposed boring. A minimum depth of 60 vertical feet is required due to the contamination potential at 30 feet. If large amounts of contamination are encountered in bottom-hole samples, additional depth may be required.
3. Soil sampling plan containing at a minimum the following elements:
 - a) Method and equipment used to collect the samples. Sample collection and treatment procedures should follow EPA guidelines to minimize loss of volatiles and must be adequately described in the technical report. Your current work plan mentions only "procedures established by the State". More detail is needed to ensure sample integrity required by the RWQCB. See the enclosed "Work Plan Requirements" guide.
 - b) Description of proposed soil sampling procedures. Discrete samples will be taken and analyzed. Any proposed screening techniques (PID, etc.) should be described.
4. Analysis plan. Your current work plan states that EPA Method 8010 is proposed. Your consultant/ laboratory can obtain additional information from this office regarding these EPA Methods.
 - a) Limits of detection should approach published EPA values. Laboratory QA/QC sheets must be submitted with the results in the technical report.

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5. Contingency plan for conversion of soil borings to monitor wells. The vapor monitoring well installation procedure in the current procedure is adequate; a ground water monitoring well conversion plan is also required.

6. Any prior work. A copy of any previous work of similar nature conducted at the site, i.e. tank closure, should be submitted with the work plan. The HLA review satisfies this requirement.

If soil or water contamination is confirmed at your facility a more extensive ground water investigation may be required. The revised work plan outlined above should be received by this agency no later than July 22, 1987. If you have any questions, please call Mercedes Murillo at (213) 620-3789.



Roy R. Sakaida
Senior Water Resources
Control Engineer

Enclosure

cc: Tom Mulvaney, OTI
Kelsey Swartz, LACDPW